

in paragraphs 36, 139, 140, 394, 396, 399, and 440 of the First Amended Complaint.

20. Identify all officers that “rushed and attacked Ms. Rodriguez”, “shoved Ms. Rodriguez’s face into a gate”, “pulled Ms. Rodriguez’s hair, squeezed the back of her neck, flipped her around such that her back was against the gate, and the repeatedly punched Ms. Rodriguez in the stomach”, as alleged in paragraphs 135, 136, and 137 of the First Amended Complaint.

21. Identify all officers that used excessive force against the plaintiff Shellyne Rodriguez, as alleged in paragraphs 36, 384, and 385 of the First Amended Complaint.

### **DOCUMENT REQUESTS**

1. Produce all documents identified in your responses to the Interrogatories.
2. Produce all documents and communications concerning the Incident.
3. Produce all documents concerning any injuries or damages that plaintiff claims were caused or exacerbated by the Incident.
4. Produce all documents concerning economic damages or losses that plaintiff claims were caused by the Incident.
5. Produce all documents and communications relating to the defense of any criminal prosecution, appeal or petitions concerning the Incident, including without limitation, the files and documents in the possession of your criminal defense attorneys, appellate attorneys, C.P.L. 440, habeas, or probation or parole attorneys who were in anyway involved in any aspect of your prosecution or incarceration.
6. Produce all documents concerning any complaints or statements made by plaintiff or anyone on plaintiff’s behalf, or communications to any person/entity, including without limitation the media, U.S. Department of Justice, U.S. Attorneys’ Office, District Attorney’s Office, N.Y.S. Attorney General, CCRB, or NYPD’s OIG or IAB, or any law enforcement agency, concerning the Incident.

7. Produce all photographs, video or audio recordings, or their electronic equivalent (images and/or files on any electronic storage device such as cell phones, PDA's, computers, CD-ROMs or DVD's), concerning (a) the Incident, and/or (b) any injuries and/or damages arising from, or caused or exacerbated by, the Incident. Defendant requests exact duplicates of all images and/or files on any electronic storage device, with all metadata, including without limitation, all date, time and location stamps.

8. Produce all documents concerning the individual defendants or any involved City employees or officers, including, without limitation, documents from the media, internet searches, internet-based social network sites, any on-line databases including the NYC disciplinary databases, NYCLU database, LAS Cop Accountability Project, CAPstat.nyc, other claims or lawsuits, and/or criminal proceedings.

9. If plaintiff claims that any pre-existing physical or emotional condition was exacerbated by the Incident, produce all documents concerning the pre-existing injury or condition that was exacerbated by the Incident.

10. Produce a completed medical release for plaintiff's healthcare records and healthcare insurance coverage records for each person/entity who provided healthcare for any physical or emotional injuries that plaintiff claims arose from, or were caused or exacerbated by, the Incident (this includes without limitation releases for any EMS service, Central Booking pre-arraignment medical screening) and Correctional Health Services.<sup>1</sup> Copies of the standard NYS HIPAA release and NYCHHC HIPAA release are attached. If plaintiff received healthcare for any

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<sup>1</sup> Produce a separate medical release for each healthcare provider and/or healthcare insurance coverage provider. The medical releases should be fully executed by plaintiff in the format acceptable to the healthcare provider or healthcare insurance coverage provider to whom it is addressed, and should be initialed so as to permit defense counsel to speak to the healthcare provider. [Authorizations for Correctional Health Services records must be addressed to NYC Health & Hospital, CHS Medical Records Unit, 55 Water Street 18th Floor, New York, New York 10041.](#)